Mark Choate, 8011070 Choate Law Firm LLC 424 N. Franklin Street Juneau, AK 99801

Phone: (907) 586-4490

E-mail: lawyers@choatelawfirm.com

Amanda Harber, 1011119 49<sup>th</sup> State Law LLC P.O. Box 661 Soldotna, AK 99669 Phone: (907) 545-4435

E-mail: amanda@49thstatelaw.com

Adam W. Hansen\* pro hac vice forthcoming Eleanor Frisch\* pro hac vice forthcoming Apollo Law LLC
333 Washington Avenue North, Suite 300
Minneapolis, MN 55401
Phone: (612) 927-2969
Empile dam@enello.law.com

E-mail: adam@apollo-law.com eleanor@appollo-law.com

Attorneys for Plaintiff

## IN THE UNITED STATES DISTRICT COURT DISTRICT OF ALASKA

ELIZABETH BAKALAR,

Plaintiff,

v.

MICHAEL J. DUNLEAVY, in his individual and official capacities; TUCKERMAN BABCOCK; and the STATE OF ALASKA,

Defendants.

PLAINTIFF'S MOTION TO ALLOW OVERLENGTH BRIEF

Case No. 3:19-CV-0002

PLAINTIFF'S MOTION TO ALLOW OVERLENGTH BRIEF Bakalar v. Dunleavy et al., Case No. 3:19-cv-00025 Page 1 of 2 CHOATE LAW FIRM LLC 424 N. Franklin Street Juneau, AK 99810 (907) 586-4490 PLAINTIFF'S MOTION TO ALLOW OVERLENGTH BRIEF

Plaintiff moves the court for permission to file an overlength brief in combined

opposition to the defendants' Motion for Summary Judgment and in support of plaintiff's

cross-motion for summary judgment. Pursuant to Local Civil Rule 5.1(f)(2), a separate

filing for each document will be made but plaintiff's cross-motion for summary judgment

simply incorporates by reference the brief in opposition to motion for summary judgment

and cross-motion for summary judgment.

There are a significant host of important legal issues to be resolved by the court.

These include important constitutionally protected speech issues as well as the requests for

injunctive relief to prohibit "loyalty pledges" being required in the future of the state's

partially-exempt workforce. These issues support the over-length brief that combines both

the opposition and cross-motion for summary judgment. Plaintiff's combined brief is 76

pages long utilizing a proportionately spaced font that takes a little more space but is

significantly easier to read. It is called "Century Supra B" by Matthew Butterick,

"Typography for Lawyers," 2d. Ed. 2015, Jones McClure Publishing.

DATED this 30th day of July, 2021.

/s/ Mark Choate

Mark Choate, 8011070

Choate Law Firm LLC

424 N. Franklin Street

Juneau, AK 99801

Phone: (907) 586-4490

E-mail: lawyers@choatelawfirm.com

PLAINTIFF'S MOTION TO ALLOW OVERLENGTH BRIEF Bakalar v. Dunleavy et al., Case No. 3:19-cv-00025 Page 2 of 2

CHOATE LAW FIRM LLC

424 N. Franklin Street